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*Proposed Co-Counsel for Debtors and
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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

WEWORK INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 23-19865 (JKS)

(Jointly Administered)

APPLICATION FOR ORDER SHORTENING TIME

TO: THE HONORABLE JOHN K. SHERWOOD UNITED STATES BANKRUPTCY
COURT FOR THE DISTRICT OF NEW JERSEY

The above-captioned debtors and debtors in possession (collectively, the “Debtors”), by and through their undersigned proposed co-counsel, request that the time period to notice a hearing on the *Debtors’ Motion for Entry of an Order (I) Authorizing the Debtors to Obtain Postpetition*

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/WeWork>. The location of Debtor WeWork Inc.’s principal place of business is 12 East 49th Street, 3rd Floor, New York, NY 10017; the Debtors’ service address in these chapter 11 cases is WeWork Inc. c/o Epiq Corporate Restructuring, LLC 10300 SW Allen Blvd. Beaverton, OR 97005.

Financing, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief [Docket No. 186] (the “Motion”),² as required by Fed. R. Bankr. P. 2002, be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), and respectfully submit:

1. A shortened time hearing is requested because: To preserve the value of the Debtors’ estates, the Debtors need timely access to the LC support to be provided under the DIP Facilities by no later than December 6, 2023. There is approximately \$52 million of LCs coming due under the prepetition LC Facility by December 13, 2023, and approximately an additional \$78.3 million of LCs coming due under the prepetition LC Facility by December 31, 2023. Because the LCs will not renew postpetition in the ordinary course of business, it is critical that the Debtors and its non-Debtor affiliates obtain access to the DIP Facilities so that they may renew and issue LCs in support of their lease obligations as the prepetition LCs come due. Failure to obtain such relief at the second day hearing would be highly disruptive to the Debtors’ operations and restructuring efforts during this critical stage of these chapter 11 cases.

2. The Debtors believe that the relief sought herein and in the Motion appropriately balances the need to provide all parties in interest with notice and due process and the Debtors’ interest in an expeditious process, commensurate with the need to preserve value for the Debtors’ estates. All relevant parties in interest to the DIP Facilities, including the DIP Secured Parties, support approval of the DIP Facilities and the relief sought herein. Furthermore, approval of the relief requested herein and the Motion will not impair or affect any landlord’s right to draw from LCs to support rent obligations because the DIP Facilities function largely in the same manner as

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

the prepetition LC Facility. Therefore, contract counterparties potentially implicated in the proposed transition from the prepetition LC Facility to the DIP Facilities will be unaffected by the relief sought herein. As such, the Debtors do not believe that any party will be prejudiced by the shortened notice for the hearing.

3. Moreover, hearing the Motion on December 6, 2023, the same date that the Debtors and parties in interest are scheduled to appear before the Court to consider relief requested in various first day motions on a final basis, will allow the Debtors to reduce administrative fees associated with an additional hearing on the Motion on standard notice, thereby maximizing value for the Debtors' estates.

4. State the hearing dates requested: The Debtors respectfully request that the Court hear the Motion on December 6, 2023, at 11:00 a.m., prevailing Eastern Time, the date set for the second day hearing before the Court, and set an objection deadline no later than November 30, 2023, at 4:00 p.m., prevailing Eastern Time.

5. Reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1).

WHEREFORE, the Debtors respectfully request entry of the proposed order shortening time, in substantially the form submitted herewith, granting the relief requested herein and such other relief as is just and proper under the circumstances.

Dated: November 19, 2023

/s/ Michael D. Sirota

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